

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

DAVID J. BOSHEA

*

Plaintiff,

*

Case No. 1:21-CV-00309-ELH

v.

*

COMPASS MARKETING, INC.

*

Defendant.

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* * * * *

MOTION TO EXTEND DISCOVERY DEADLINE

Defendant Compass Marketing, Inc. (“Compass Marketing”), by and through its undersigned counsel and pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure, hereby files this Motion to Extend Discovery Deadline, and in support states the following:

1. Pursuant to this Court’s Scheduling Order [Dkt. No. 20] and Order dated November 29, 2021 [Dkt. No. 73], the discovery deadline in the above captioned case is January 14, 2022.
2. There exists good cause to extend the discovery deadline in this case.
3. This Court has scheduled a Virtual Show Cause Hearing for Wednesday, March 9, 2022, ordering non-parties Daniel White and Michael White to show cause as to why they should not be held in contempt of court.
4. If the Court determines that Daniel White and Michael White should be held in contempt, they will both need to be re-deposed.
5. Therefore, there is good cause to extend the discovery deadline in this case pending the outcome of the Show Cause Hearing in March.

6. In addition, Compass Marketing was unable to complete the deposition of George White prior to the close of discovery and Compass Marketing seeks to complete that deposition.

7. Pursuant to Local Rule 105.9, undersigned counsel conferred with Mr. Boshea's counsel prior to filing this motion (January 13 and January 14), and Mr. Boshea's counsel consented to an extension of the discovery deadline in this case to complete Daniel White's, Michael White's, and Georg White's depositions.¹

WHEREFORE, for the reasons set forth above Compass Marketing requests that this Court extend the discovery deadline in this case, as well as the deadline for filing dispositive motions, pending the outcome of the Show Cause Hearing on March 9, 2022.

Dated: January 14, 2022

Respectfully submitted,

/s/Stephen B. Stern

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Counsel for Defendant

Compass Marketing, Inc.

¹ Although Mr. Boshea's counsel agreed to the extension of discovery to complete these depositions, he sought to limit the scope of the continued depositions for Daniel White and Michael White in a manner that would limit Compass Marketing's ability to obtain information that goes to their credibility and bias. As reflected in prior briefs filed by Compass Marketing, matters concerning credibility and bias are relevant and appropriate lines of questions for depositions.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of January, 2022, the foregoing Motion to Extend Discovery Deadline was served via the CM/ECF system on the following counsel of record:

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